

Roger H. Hoole 5089
HOOLE & KING, L.C.
Attorneys for Plaintiffs
4276 South Highland Drive
Salt Lake City, Utah 84124
Telephone: (801) 272-7556
Facsimile: (801) 272-7557
rogerh@hooleking.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF BRIELL DECKER**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Briell Decker, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.

2. I am a Plaintiff in the above-captioned matter.

3. I make these statements based on my own knowledge and belief.

4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 26, 2022.

5. Based on my TVPRA claim against Warren Jeffs, I testified at trial that I suffered damages. Specifically, before I was spiritually married to Jeffs I incurred damages for withheld wages in the amount of \$7,107 as set forth in trial Exhibit A.

6. After marrying Warren Jeffs when I was 18 on January 18, 2003, I was required to leave my home in Arizona and live and work in various states. It was a 24/7 job to be married to the Prophet.

7. As part of that, Jeffs required that I provide labor and services to him and for his benefit. As I testified, I sewed, cooked, gardened, cleaned, taught school, watched preschoolers, and corrected schoolwork.

8. I estimate that between my marriage in January 2003 until I finally got away in May 2012, I worked an average of at least 40 hours a week doing physical labor for Jeffs' benefit.

9. I conservatively claim \$140,650 as the minimum value of the free labor that Warren Jeffs obtained from me. This estimated amount is based on my work over a span of 485 weeks, 40 hours a week at a wage of \$7.25 an hour. In coming to this estimate, I have attempted to be conservative.

10 While I was under Jeffs' control, Jeffs knowingly forced me and threatened me with force both to myself and to my family to obtain my labor and services. Jeffs also knowingly used physical restraint and the threat of physical restraint by keeping me confined in various places of refuge and houses of hiding to obtain my labor and services. Jeffs also knowingly using his fraudulent scheme, plan, and pattern to cause me to believe that if I did not provide labor and services for him, I would suffer serious harm and physical restraint.

11. As one of Jeffs' wives, I had housing, food, and utilities provided by the FLDS Church. I also had access to the Bishop's Storehouse for other necessities.

12. From the time I was married at 18 and no longer entitled to the necessities of life from my parents, I often lived in cramped communal housing with numerous other Jeffs' wives and had basic food and utilities provided in a communal living context.

13. Depending on whether I was being favored or punished, my accommodations sometimes provided a very poor standard of living similar to that experienced by other victims of labor trafficking and at other times a slightly higher standard more similar to that experienced by some sex trafficking victims.

15. The value of those necessities should be set off against the higher hourly rates (above minimum wage) that I should have been paid from the time I was 18.

16. I estimate the value of the necessities I received while a plural wife of Warren Jeffs at \$300 a month over nine years ($\$300 \times 12 \text{ months} \times 9 \text{ years}$) for a total of \$32,400, which total amount may, in the Court's discretion, be deducted from my economic damages.

17. Being married to and labor trafficked by Jeffs resulted in significant mental health and emotional injuries. My medical needs have been and continue to be significant. At trial I estimated my medical bills for mental health treatment and hospitalizations at \$900,000. I believe that estimate is conservative.

18. My economic damages after deductions for the necessities provided to me (\$7,107 + \$140,650 - \$32,400 + \$900,000), therefore, amount to \$1,015,357.

19. In terms of general or non-economic damages, I testified at trial about what I went through in the nine years before I could escape. I also summarized what I continue to go through and will likely suffer with for the rest of my life. Based on that, I ask for general damages in the amount of \$4,000,000.

20. Therefore, I estimate that my total economic and non-economic damages are at least \$5,015,357 (\$1,015,357 + \$4,000,000).

21. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

Briell Decker

17. Being married to and labor trafficked by Jeffs resulted in significant mental health and emotional injuries. My medical needs have been and continue to be significant. At trial I estimated my medical bills for mental health treatment and hospitalizations at \$900,000. I believe that estimate is conservative.

18. My economic damages after deductions for the necessities provided to me (\$7,107 + \$140,650 - \$32,400 + \$900,000), therefore, amount to \$1,015,357.

19. In terms of general or non-economic damages, I testified at trial about what I went through in the nine years before I could escape. I also summarized what I continue to go through and will likely suffer with for the rest of my life. Based on that, I ask for general damages in the amount of \$4,000,000.

20. Therefore, I estimate that my total economic and non-economic damages are at least \$5,015,357 (\$1,015,357 + \$4,000,000).

21. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

Briell Decker
Briell Decker